

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 4:09CR142
	§	Judge Schell
VERONICA VASQUEZ (8)	§	

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Second Superseding Indictment with a violation of 21 U.S.C. § 846, Conspiracy to Possess with the Intent to Distribute 5 kilograms or more of a mixture containing a detectable amount of cocaine. The essential elements which must be proved beyond a reasonable doubt in order to establish a violation of that section are:

1. That you and one or more persons, in some way or manner made an agreement to commit the crime charged in the Indictment, that is, to possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine;
2. That you knew the unlawful purpose of the agreement and joined in it with the intent to further it; and,
3. That you knowingly and voluntarily joined in the agreement, that is, with the intent to further its unlawful purpose.

Respectfully submitted,

JOHN M. BALES
United States Attorney

/s/ _____
ERNEST GONZALEZ
Assistant United States Attorney
101 East Park Blvd., Suite 500
Plano, Texas 75074
Telephone: 972/509-1201
Facsimile: 972/509-1209
State Bar No. 00789318

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on this the 10th day of January, 2011.

/s/ _____
Ernest Gonzalez